

EXHIBIT A



**Service of Process
Transmittal**

02/08/2016

CT Log Number 528609542

TO: Mai Tran, Asst. Admin/Freight West
FedEx Freight West, Inc.
3425 Victor St
Santa Clara, CA 95054-2319

RE: **Process Served in Illinois**

FOR: FedEx Freight, Inc. (Domestic State: AR)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: MICHELE WYSOGLAD, Pltf. vs. FEDEX FREIGHT, INC. and RONALD L. ARTHUR, Dfts.

DOCUMENT(S) SERVED: Summons, Amended Complaint

COURT/AGENCY: Cook County Circuit Court - County Department - Law Division, IL
Case # 2016L000694

NATURE OF ACTION: Personal Injury - Vehicle Collision - Amended complaint is hereby filed by the plaintiff in the referred matter

ON WHOM PROCESS WAS SERVED: C T Corporation System, Chicago, IL

DATE AND HOUR OF SERVICE: By Process Server on 02/08/2016 at 12:20

JURISDICTION SERVED : Illinois

APPEARANCE OR ANSWER DUE: Within 30 days after service of this Summons, not counting the day of service

ATTORNEY(S) / SENDER(S): Sara M. Davis
WHITING LAW GROUP
One East Wacker Drive
Suite 2300
Chicago, IL 60601
312-372-1655

ACTION ITEMS: SOP Papers with Transmittal, via Fed Ex 2 Day , 782336586497

Image SOP

Email Notification, Mai Tran mai.tran@fedex.com

Email Notification, Brad Crawford brad.crawford@fedex.com

Email Notification, Christy Conrad christy.conrad@fedex.com

Email Notification, Richard Goldaber richard.goldaber@fedex.com

Email Notification, Mireya Llaurodo mallaurado@fedex.com

Email Notification, Diana Woods diana.woods@fedex.com

Email Notification, Timothy Bland timothy.bland@fedex.com



CT Corporation

**Service of Process
Transmittal**

02/08/2016

CT Log Number 528609542

TO: Mai Tran, Asst. Admin/Freight West
FedEx Freight West, Inc.
3425 Victor St
Santa Clara, CA 95054-2319

RE: Process Served in Illinois

FOR: FedEx Freight, Inc. (Domestic State: AR)

Email Notification, Joe Timbol joe.timbol@fedex.com

SIGNED: C T Corporation System
ADDRESS: 208 South LaSalle Street
Suite 814
Chicago, IL 60604
TELEPHONE: 312-345-4336

Page 2 of 2 / KB

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

2120 - Served
 2220 - Not Served
 2320 - Served By Mail
 2420 - Served By Publication

2121 - Served
 2221 - Not Served
 2321 - Served By Mail
 2421 - Served By Publication

☒ SUMMONS☐ ALIAS - SUMMONS

(2/18/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION

MICHELE WYSOGLAD;

(Name all parties)

v.

FEDEX FREIGHT, INC.

No. 2016-L-000694

Defendant Address:

FEDEX FREIGHT, INC.
 R/A CT CORPORATION SYSTEM
 208 S. LASALLE ST.. SUITE 814
 CHICAGO, IL 60604

Summons

To each Defendant:

☒ SUMMONS☐ ALIAS - SUMMONS

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

☐ District 2 - Skokie
 5600 Old Orchard Rd.
 Skokie, IL 60077

☐ District 3 - Rolling Meadows
 2121 Euclid
 Rolling Meadows, IL 60008

☐ District 4 - Maywood
 1500 Maybrook Ave.
 Maywood, IL 60153

☐ District 5 - Bridgeview
 10220 S. 76th Ave.
 Bridgeview, IL 60455

☐ District 6 - Markham
 16501 S. Kedzie Pkwy.
 Markham, IL 60426

☐ Child Support
 28 North Clark St., Room 200
 Chicago, Illinois 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 37395

Name: WHITING LAW GROUP

Atty. for: MICHELE WYSOGLAD

Address: 1 E WACKER DR #2300

City/State/Zip: CHICAGO, IL 60601

Telephone: (312) 372-1655

WITNESS, Thursday, 21 January 2016



Date of service:

(To be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at: _____
 (Area Code) (Facsimile Telephone Number)

/s/ DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

MICHELE WYSOGLAD,

Plaintiff,

vs.

FEDEX FREIGHT, INC. and
RONALD L. ARTHUR,

Defendants.

Case No: 2016 L 000694

PLAINTIFF DEMANDS
TRIAL BY JURY

AMENDED COMPLAINT AT LAW

NOW COMES the Plaintiff, MICHELE WYSOGLAD, and complaining of the Defendants, FEDEX FREIGHT, INC. and RONALD L. ARTHUR, alleges as follows:

COUNT I

MICHELE WYSOGLAD V. FEDEX FREIGHT, INC.

1. On or about February 26, 2014, the Plaintiff, MICHELE WYSOGLAD, was a resident of the City of Naperville, County of DuPage, State of Illinois.
2. That on said date, the Defendant, FEDEX FREIGHT, INC., was a foreign corporation with its principal place of business in Little Rock, Arkansas, engaging in business in the State of Illinois as a common carrier.
3. That on said date, the Defendant, RONALD L. ARTHUR, was an agent, employee and/or representative of the Defendant, FEDEX FREIGHT, INC., and was acting in the course and scope of his employment for FEDEX FREIGHT, INC.
4. That on said date, Halsted Street at or near its intersection with 183rd Street, in the Town of Homewood, County of Cook, State of Illinois was a public thoroughfare running in a north and south direction.

FILED B-15
2016 FEB-2 AM 9:00
CLERK OF CIRCUIT COURT
- JUDGE

5. That on said date, 183rd Street at or near its intersection with Halsted Street in the Town of Homewood, County of Cook, State of Illinois was a public thoroughfare running in an east and west direction.

6. That on said date, the Plaintiff, MICHELE WYSOGLAD, was legally operating her automobile southbound on Halsted Street, at or near the intersection with 183rd Street, in the Town of Homewood, County of Cook, State of Illinois.

7. That on said date, the tractor trailer owned, operated, controlled, managed, and maintained by the Defendant, FEDEX FREIGHT, INC., was also traveling in a southbound direction on Halsted Street, at or near the intersection with 183rd Street, in the Town of Homewood, County of Cook, State of Illinois.

8. That on said date, the tractor trailer was driven by a FEDEX FREIGHT, INC. agent, employee, and/or representative, RONALD L. ARTHUR.

9. That on said date, the FEDEX FREIGHT, INC. tractor trailer driven by the Defendant, RONALD L. ARTHUR, struck the automobile lawfully operated by MICHELE WYSOGLAD.

10. That on said date, and pursuant to the doctrine of *respondent superior*, FEDEX FREIGHT INC., is responsible for the negligent acts and/or omissions of its employee and/or agent, RONALD L. ARTHUR, while he operated a tractor trailer in the course and scope of this employment and/or agency.

11. That on said date, the Defendant, FEDEX FREIGHT, INC., by and through its duly authorized agent, employee, and/or representative, RONALD L. ARTHUR, owed a duty of care to the Plaintiff to exercise reasonable care in owning, operating, controlling, managing,

and/or maintaining said tractor trailer to avoid striking the automobile driven by MICHELE WYSOGLAD.

12. That on said date, the Defendant, FEDEX FREIGHT, INC., by and through its duly authorized agent, employee, and/or representative, RONALD L. ARTHUR, was negligent in one or more of the following ways:

- a. Failed to maintain sufficient and proper control over the operation of said tractor and trailer while on said roadway;
- b. Failed to keep a safe and proper following distance behind vehicles in front of it;
- c. Failed to drive the tractor and trailer at a speed which would have prevented striking the Plaintiff's vehicle on said roadway contrary to and in violation of 625 ILCS § 5/11-601(a);
- d. Failed to decrease speed of the tractor trailer as necessary to avoid colliding with the Plaintiff;
- e. Operated a tractor trailer at a speed greater than was reasonable and proper with regard to traffic conditions then and there existing;
- f. Failed to have the tractor trailer equipped with brakes adequate to control the movement of the commercial vehicle in violation of 625 ILCS 5/12-301;
- g. Failed to stop when faced with a traffic control signal exhibiting a steady red; and
- h. Failed to give audible warning with a horn or other warning device when such warning was reasonably necessary to insure safety in violation of 625 ILCS 5/12-601.

13. As a direct and proximate result of the aforesaid negligent acts and/or omissions of the Defendant, FEDEX FREIGHT, INC., the Plaintiff, MICHELE WYSOGLAD then and there sustained and will continue to endure severe and permanent injuries, pain and suffering, wage loss, disability and/or loss of normal life, medical expenses, and other compensable losses.

WHEREFORE, the Plaintiff, MICHELE WYSOGLAD, demands judgment against the Defendant, FEDEX FREIGHT, INC., in an amount in excess of the minimum jurisdictional limits of this Court, and any and all other relief this Court deems appropriate, plus costs.

COUNT II
MICHELE WYSOGLAD V. RONALD L. ARTHUR

14. On or about February 26, 2014, the Plaintiff, MICHELE WYSOGLAD, a resident of the City of Naperville, County of DuPage, State of Illinois.

15. That on said date, the Defendant, RONALD L. ARTHUR, was an agent, employee and/or representative of the Defendant, FEDEX FREIGHT, INC., and was acting in the course and scope of his employment for FEDEX FREIGHT, INC.

16. That on said date, Halsted Street was a public thoroughfare traveling in a south and north bound direction in the Town of Homewood, County of Cook, State of Illinois.

17. That on said date, 183rd Street was a public thorough fare traveling in an east and west bound direction in the Town of Homewood, County of Cook, State of Illinois.

18. That on said date, the Plaintiff, MICHELE WYSOGLAD, was lawfully operating her vehicle southbound on Halsted Street in the Town of Homewood, County of Cook, State of Illinois.

19. That on said date, a tractor trailer, operated, controlled, and managed by the Defendant, RONALD L. ARTHUR, was also traveling in a southbound direction on Halsted Street at or near the intersection with 183rd Street, in the Town of Homewood, County of Cook, State of Illinois.

20. That on said date, the tractor trailer driven by the Defendant, RONALD L. ARTHUR, struck the automobile lawfully operated by the Plaintiff, MICHELE WYSOGLAD.

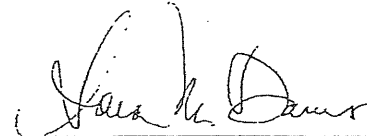
21. That on said date, the Defendant, RONALD L. ARTHUR, owed a duty of care to the Plaintiff to exercise reasonable care and owning, operating, controlling, managing and/or maintaining said tractor trailer to avoid striking the automobile of the Plaintiff, MICHELE WYSOGLAD.

22. That on said date, the Defendant, RONALD L. ARTHUR, was negligent in one or more of the following ways:

- a. Failed to maintain sufficient and proper control over the operation of said tractor and trailer while on said roadway;
- b. Failed to keep a safe and proper following distance behind vehicles in front of it;
- c. Failed to drive the tractor and trailer at a speed which would have prevented striking the Plaintiff's vehicle on said roadway contrary to and in violation of 625 ILCS § 5/11-601(a);
- d. Failed to decrease speed of the tractor trailer as necessary to avoid colliding with the Plaintiff;
- e. Operated a tractor trailer at a speed greater than was reasonable and proper with regard to traffic conditions then and there existing;
- f. Failed to have the tractor trailer equipped with brakes adequate to control the movement of the commercial vehicle in violation of 625 ILCS 5/12-301;
- g. Failed to stop when faced with a traffic control signal exhibiting a steady red; and
- h. Failed to give audible warning with a horn or other warning device when such warning was reasonably necessary to insure safety in violation of 625 ILCS 5/12-601.

23. As a direct and proximate result of the aforesaid negligent acts and/or omissions of the Defendant, RONALD L. ARTHUR, the Plaintiff, MICHELE WYSOGLAD then and there sustained and will continue to endure severe and permanent injuries, pain and suffering, wage loss, disability and/or loss of normal life, medical expenses, and other compensable losses.

WHEREFORE, the Plaintiff, MICHELE WYSOGLAD, demands judgment against the Defendant, RONALD L. ARTHUR, in an amount in excess of the minimum jurisdictional amount of this Court, and any and all other relief this Court deems appropriate, plus costs.



Sara M. Davis
Attorney for the Plaintiff,
MICHELE WYSOGLAD

WHITING LAW GROUP
One East Wacker Drive, Suite 2300
Chicago, IL 60601
Office: (312) 372-1655
Fax: (312) 279-1111
Email: sdavis@wlglaw.net
Firm I.D. 37395